

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

CREIGHTON TAKATA, individually and on behalf of all others similarly situated,

Plaintiff,

v.

RIOT BLOCKCHAIN, INC. F/K/A, BIOPTIX, INC., JOHN O'ROURKE, and JEFFREY G. MCGONEGAL,

Defendants.

Case No. 18-2293(FLW)(TJB)

NOTICE OF DEFENDANT MARK GROUSSMAN'S JOINDER IN THE OPPOSITION OF BARRY HONIG TO LEAD PLAINTIFF'S MOTION FOR LEAVE TO FILE [PROPOSED] CONSOLIDATED SECOND AMENDED CLASS ACTION COMPLAINT

MOTION DATE: JULY 6, 2019

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Defendant Mark Groussman (“Groussman”) respectfully joins in the relief requested in the June 22, 2020 Memorandum of Law in Support of the Opposition of Barry Honig to Lead Plaintiff's Motion for Leave to File [Proposed] Consolidated Second Amended Class Action

Complaint (the “Opposition”) (ECF No. 173). Pursuant to Rule 10(c) of the Federal Rules of Civil Procedure, Groussman adopts and incorporates by reference the Opposition herein. For the reasons set forth in the Opposition, Groussman respectfully requests that the Court grant the relief requested in the Opposition.

Groussman makes this Joinder in the interest of judicial economy because the arguments raised in the Opposition apply equally well to Groussman and mandate denial of the Motion for Leave to Amend. By filing this Joinder, Groussman does not waive, and expressly reserves, his right to move to dismiss the Second Amended Complaint in the event the Court grants any aspect of the Motion for Leave to Amend.

Dated: June 24, 2020

GIBBONS P.C.

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